

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

JOSEPH WASHINGTON <i>et al.</i> ,)	
)	
Plaintiffs)	
)	
v.)	Civil Action No.16-cv-03948 (SMG)
)	
UNITED STATES DEPARTMENT OF)	
HOUSING AND URBAN)	
DEVELOPMENT, <i>et al.</i>)	
)	
)	
Defendants)	
_____)	

DECLARATION OF JOHN W. LUCEY

I, John W. Lucey, do hereby make the following declaration upon my personal knowledge, information, and belief:

1. I am employed by the U.S. Department of Housing and Urban Development (“HUD”) as the Director of the Office of Asset Sales.
2. I have worked for HUD for 14 years, and have served in my current position for 3 years.
3. My duties include the management of HUD’s Distressed Asset Stabilization Program (“DASP”) sales, and I am the custodian of the records in the Office of Asset Sales.
4. Prior to a note sale under DASP, HUD enters into a Participating Servicer Agreement (“PSA”) with each participating mortgagee that elects to submit loans for the upcoming sale.

5. The PSA is a binding contract between HUD and the mortgagee that provides the terms upon which the servicer agrees to submit eligible, defaulted mortgages for participation in the sale.
6. Under the terms of the PSAs, the mortgagees warrant and represent to HUD in Article III, Section 3.02 that each loan they submit for sale meets the criteria for an Eligible Mortgage Loan.
7. The attached PSAs are true and accurate copies of the PSAs from Single Family Loan Sale 2014-2 with the mortgagees holding the loans identified:
 - a. Exhibit A: Freedom Mortgage Corporation (Joseph Washington—374-6236233);
 - b. Exhibit B: Continental Home Loans Inc. (St. Clair Blackett—374-6132962); and
 - c. Exhibit C: JP Morgan Chase Bank, National Association (Lucille Mason—374-5104892).
8. In the normal course of business, the Office of Asset Sales would be the primary repository of these and other PSAs from DASP sales.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct, to the best of my knowledge, information, and belief.



John W. Lucey
Director, Office of Asset Sales
U.S. Department of Housing & Urban Development

Executed on:

April 17, 2017